



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

November 19, 2004

Curt Frye, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Final Work Plan Sediment and Groundwater Monitoring, Site 9, Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Final Work Plan, Sediment and Groundwater Monitoring, Site 9, Old Fire Fighting Training Area dated November 12, 2004. In the cover letter the Navy has stated, "the work plan has been prepared to direct limited, short term sampling at the site prior to and during the removal activities. Additional work plans will be prepared to describe long term monitoring of the sediments after the soil removal action has been completed". In essence, in regards to the sediments, this is an interim work plan simply designed to ascertain whether erosion control measures at the site are satisfactorily working. As such, the Navy has proposed collecting sixteen samples in lieu of the minimum of twenty samples, which is typically needed in order to perform a statistical analysis.

As of this writing the mound removal action is still ongoing and samples are being collected and sent off site for analysis. During a removal action unexpected contamination may be uncovered. The function of the proposed interim-monitoring plan is to evaluate whether any contamination from the mounds left the site during the removal action. Therefore, the work plan must stipulate that the analytical results from the mound removal action will be reviewed. Sediment sampling will, at a minimum, reflect constituents of concern, which were discovered during the removal process. In regards to TPH analysis, a variety of petroleum products have been found at the site during past investigations. This information, in conjunction with the TPH results from the mound removal should be reviewed to determine whether the proposed TPH analysis of the sediments is appropriate.

The Navy has proposed collecting the samples immediately after the mound removal has been completed. This will allow the Navy to study short-term erosion associated with the active removal of the mounds (long term erosion associated with the lack of vegetative cover will not be addressed). Although not stated in the work plan it is assumed that if elevated levels are encountered, the source of the contamination will be investigated and the necessary steps will be taken to correct the erosion problem. The necessary steps will probably entail the installation of additional silt fences and/or hay

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30% post-consumer fiber

bails. The Navy may wish to evaluate whether it is more cost effective to simply install a second silt curtain and/or row of hay bails as opposed to conducting this study.


Finally, as reflected in the comments and discussions the Office of Waste Management raised a number of questions concerning the validity of the proposed forensic study as it reflects previous studies which was found unacceptable. Please be advised that the Office of Waste Management position concerning this matter has not changed. Specifically, the Office of Waste Management does not approve the proposal of performing a similar forensic study, nor will it accept any conclusions generated from this study or any positions based upon such a study.

The Office of Waste Management approves of this limited sampling effort with the following caveats:

1. Approval of this approach is site and situation specific, it shall not be construed as a change in RIDEM policy or a change in the sampling requirements for statistical analysis under the Site Remediation Regulations, nor shall this approach be deemed acceptable for other sites or other conditions.
2. The sediment sampling effort will address the aforementioned concerns cited in paragraph two of this letter.
3. The sampling effort is simply designed to address the effectiveness of erosion control, and whether releases had occurred as a result of the removal action. It is not a study to determine, nor will it be accepted as a study to determine, the distribution of contaminants in the sediments, to ascertain the source of contamination of the sediments (i.e. whether the contamination is from the site, up gradient storm drains, etc), to find out whether degradation of contaminants is occurring, to determine whether the proposed onshore removal action will result in a reduction of contaminants in the sediments, etc.. Further, the proposed forensic analysis has not been approved
4. This is an interim monitoring program, a final long term monitoring program will be produced at a later date.
5. This approach cannot be used as a template for long term monitoring.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,



Paul Kulpa
Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornellia Mueller, NSN